

# Exhibit A

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ETHLOKIA PLUMBER, ex rel., K.W. §  
§  
*Plaintiffs,* § CIVIL ACTION NO. 4:20-CV-00672  
v. §  
§  
HARRIS COUNTY DEPARTMENT §  
OF EDUCATION, §  
§  
*Defendant.* §

**DECLARATION OF L. KYM DAVIS ROGERS**

I, L. Kym Davis Rogers, hereby declare as follows:

1. I am an attorney employed by Disability Rights Texas. I am admitted to the State Bar of Texas.
2. Attached to this Declaration are Exhibits 1–7. These exhibits are exact duplicates of the original records maintained by Disability Rights Texas in the ordinary course of business.

Exhibit 1: 30(b)(6) Deposition Notice

Exhibit 2: Transcript of cited portions of M. Robertson Deposition as reported by Veritext (to be filed under seal)

Exhibit 3: Transcript of cited portions of D. Jackson Deposition as reported by Veritext (to be filed under seal)

Exhibit 4: Emails between M. Goins and L. Kym Davis Rogers

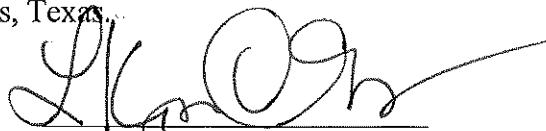
Exhibit 5: Transcript of cited portions of J. Parker Deposition as reported by Veritext (to be filed under seal)

Exhibit 6: TEA Complaint against HCDE and Cypress-Fairbanks ISD

Exhibit 7: Transcript of cited portions of J. Colbert Deposition as reported by Veritext (to be filed under seal)

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 14<sup>th</sup> day of June 2021, at Dallas, Texas.



L. Kym Davis Rogers